

PHILLIP A. TALBERT  
United States Attorney  
JUSTIN J. GILIO  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
HORACIO TORRECILLAS URIAS JR. ET  
AL,  
  
Defendants.

CASE NO. 1:22-CR-00062-JLT-SKO  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
  
DATE: August 30, 2023  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on August 30, 2023.
2. By this stipulation, defendants now move to continue the status conference until December 6, 2023, at 1:00 P.M. and to exclude time between August 30, 2023, and December 6, 2023, inclusive.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The discovery associated with this case is voluminous and includes tens of thousands of pages, including investigative reports, photographs and videos, as well as hundreds of hours of recorded telephone conversations pursuant to wiretap orders, many cellular phone extractions, and large amounts of cellular telephone precise location data and vehicle tracker

1 data. All this discovery has been either produced directly to counsel and/or made available for  
2 inspection and copying.

3 b) Counsel for defendants desire additional time to consult with their clients, conduct  
4 investigation, review the voluminous discovery, prepare for a possible trial, and explore a  
5 potential resolution of the case.

6 c) Counsel for defendants believe that failure to grant the above-requested  
7 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
8 into account the exercise of due diligence.

9 d) Defendant Alma Garza also has a motion under submission from August 19,  
10 2022. Resolution of that motion is necessary for Ms. Garza's case to move forward.

11 e) The government does not object to the continuance.

12 f) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of August 30, 2023 to December 6,  
17 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and  
18 B(iv) because the case is so unusual or so complex, due to the number of defendants, the nature  
19 of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to  
20 expect adequate preparation for pretrial proceedings or for the trial itself within the time limits  
21 established by this section. This stipulation also results from a continuance granted by the Court  
22 at defendant's request on the basis of the Court's finding that the ends of justice served by taking  
23 such action outweigh the best interest of the public and the defendant in a speedy trial.

24 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
25 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
26 must commence.

27 IT IS SO STIPULATED.  
28

1 Dated: August 15, 2023

PHILLIP A. TALBERT  
United States Attorney

3  
4 /s/ Justin J. Gilio  
JUSTIN J. GILIO  
Assistant United States Attorney

6 Dated: August 15, 2023

7 /s/ Galatea DeLapp  
Galatea DeLapp  
Counsel for Defendant  
Horacio Torrecillas Urias Jr.

9  
10 Dated: August 15, 2023

11 /s/ Scott Quinlan  
Scott Quinlan  
Counsel for Defendant  
Alma Garza

12  
13 Dated: August 15, 2023

14 /s/ Harry Drandell  
Harry Drandell  
Counsel for Defendant  
Brayan Cruz

16  
17 **ORDER**

18 IT IS SO ORDERED.

19  
20 DATED: 8/16/2023

21 Sheila K. Oberto  
THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE